

BORRELLI & ASSOCIATES

P.L.L.C.

www.employmentlawyernewyork.com

655 Third Avenue
Suite 1821
New York, NY 10017
Tel. No. 212.679.5000
Fax No. 212.679.5005

910 Franklin Avenue
Suite 200
Garden City, NY 11530
Tel. No. 516.248.5550
Fax No. 516.248.6027

March 23, 2023

Via ECF

The Honorable Steven Tiscione
United States Magistrate Judge for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Nolan v. City of New York et al., Case No. 19-cv-00187-RPK-ST

Dear Judge Tiscione:

This office represents Plaintiff William R. Nolan in the above-referenced action brought against Defendants, the City of New York (“the City”), and various individuals, for alleged violations of Plaintiff’s First, Second, and Fourth Amendment rights. We write now, with the City’s consent, to respectfully request an adjournment of Plaintiff’s time to file his Amended Complaint from the current deadline of March 27, 2023 to April 27, 2023. This is Plaintiff’s fourth and hopefully final request for an adjournment of this deadline. This adjournment is requested due to the undersigned being lead trial counsel in a jury trial before the Honorable Judge James M. Wicks in the matter of *Gedeon v. Valuecare, Inc.*, Case No. 19-cv-06954. That trial begins Monday March 27, 2023. Preparation for that trial has unexpectedly prohibited the undersigned from completing a final Amended Complaint for filing.

We thank the Court for its attention to this matter.



Andrew C. Weiss, Esq.
For the Firm

To: All counsel of record (*via ECF*)